

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF PUERTO RICO**

IN RE:

JACQUELINE CONTES SANTIAGO

DEBTOR

CASE NO. 19-01940/ESL

CHAPTER 13

**DEBTOR'S MOTION REQUESTING ORDER  
RE: AUTHORIZATION TO USE FUNDS FROM 2020 TAX REFUND**

TO THE HONORABLE COURT:

**NOW COMES, JACQUELINE CONTES SANTIAGO**, the Debtor through the undersigned attorney, and very respectfully states and prays as follows:

1. The Debtor's confirmed Plan dated September 20, 2019, provides that Debtor's tax refunds will be paid into the Plan.
2. The Debtor has received her 2020 tax refund in the amount of \$760.00. Attached is copy of bank e-statement, which reflects the direct deposit of the 2020 tax refund on March 15, 2021, issued by the Puerto Rico Treasury Department.
3. The Debtor respectfully submits to the Court that she needs to use these funds to pay for: car repairs expenses in the sum of \$792.09. Attached is copy of car repairs estimate/invoice.
4. The Debtor needs to use the funds from the 2020 "tax refund" to pay for this reasonable expense. Furthermore, the Debtor is living within a very "tight" budget which barely covers her living expenses and a Plan payment of \$175.00.
5. Based on the above-stated, the Debtor respectfully requests this Court to Order the authorization of the use of these funds for this expense.

**WHEREFORE**, the Debtor, through the undersigned attorney respectfully requests that this Honorable Court grant the foregoing motion and allow the use of the funds from the 2020 tax refund by the Debtor to pay for the above-stated expense.

**NOTICE:** Within fourteen (14) days after service as evidenced by the certification, and an additional three (3) days pursuant to Fed. R. Bank. P. 9006 (f) if you were served by mail, any party against whom this paper has been served, or any other party to the action that objects to the relief sought herein shall serve and file an objection or other appropriate response to this paper with the Clerk's office of the U.S. Bankruptcy Court for the District of Puerto Rico. If no objection or other response is filed within the time allowed herein, the paper will be deemed unopposed and may be granted unless: (i) the requested relief is forbidden by law; (ii) the requested relief is against public policy; or (iii) in the opinion of the Court, the interest of justice requires otherwise.

**I CERTIFY** that on this same date a copy of this motion was filed with the Clerk of the Court using the CM/ECF system which will send notice of same to the Chapter 13 Trustee; I also certify that a copy of this motion was sent via US Mail to the Debtor, Jacqueline Contes Santiago, to the address of record: Villa del Rey 5 A11 38 Street, Caguas PR 00727.

**RESPECTFULLY SUBMITTED.** In San Juan, Puerto Rico, this 17th days of March 2021.

**/s/ Roberto Figueroa Carrasquillo**

USDC #203614

RFIGUEROA CARRASQUILLO LAW OFFICE PSC

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WESTERN AUTO CAGUAS #2 FIPS 0  
PLAZA DEL CARMEN S/C  
CAGUAS, PR 00725  
(787)744-8721

**INVOICE 0104364**

Scan to RESUME transaction



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Vehicle B#130082#2015#HYUNDAI#SONATA#

Mileage \_\_\_\_\_ Tag # \_\_\_\_\_ VIN \_\_\_\_\_

Tire Serial # \_\_\_\_\_

Contes, Jacqueline  
CA  
CAGUAS PR 00725  
(787)638-7602

Cust#: 7495034351		Salesperson: 93402		PO#:		Date: 3/15/2021		Time: 6:35PM	
QTY	SKU/CODE	TECH	DESCRIPTION	PART NO	VEHICLE		PRICE	EXTENDED T	
2	11464723		Painted rotor 1 EA C	YH539668P	B#130082#2015#HYUND/		77.99	155.98 *	
1	11162259		BRAKE PADS-PROF PLAT	PXD1803H	B#130082#2015#HYUND/		64.99	64.99 *	
1	9800018		estimado de piezas	LABOR6	B#130082#2015#HYUND/		0.00	0.00	
Taxable Total:				220.97					
Non Taxable Total:				0.00					
State Tax:				23.20					
Reduced State Tax:				0.00					
Mun. Tax:				2.21					
Total:				246.38					

\*\*\* THIS IS NOT A RECEIPT \*\*\*

Page 1 of 1

\*\*\* CUSTOMER COPY \*\*\*

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990239

UPC CODE

ECOFIA EP422+  
215/65R16 98T BW  
GRAND TOURING A/S

\* 98T (Performance T)  
\* UTQG Rating 640A/B  
\* Silica Technology  
\* 70,000 Mile Warranty

\* BAN 006-087  
\* Smooth, Comfortable Ride  
\* Nano ProTech Technology

+ 19.99 installation package

131.99

F3=Exit F7=Next Selection

F13=Restart

F21=Print

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COSTCO WHOLESALE

CAGUAS, P.R.

Información y precios válidos

3/15/21

WHSE 365-TIRE SHOP MGR



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Estados

BANCO POPULAR

Cuenta Popular  
x3877



\$803.57

Todas

Débito

Crédito

15 DE MARZO DE 2021  
ATH MOVIL 6442

\$12.00

15 DE MARZO DE 2021

DEPT DE HACIENDA REINTEGROS

\$760.00

15 DE MARZO DE 2021

ATH MOVIL 3905

-\$15.60

15 DE MARZO DE 2021

ECONO PLAZA DEL CARMEN

-\$8.53

15 DE MARZO DE 2021